



STATE OF OREGON

ORD 5/47
Hazardous Waste Division

INTEROFFICE MEMO

TO: File

DATE: 3/20/85

FROM: Dennis Belsky
SW Region*Dennis Belsky*SUBJECT: HW - Jackson County
ORD 095-015-749
Balteau Standard, Inc.
8001 Table Rock Road
Medford, OR 97503-1089Solid Waste Division
Dept. of Environmental Quality.RECEIVED
MAR 21 1985

This memorandum and the enclosed inspection checklist summarizes an inspection conducted March 15, 1985.

BACKGROUND

Southwest Region has committed to HW Program to conduct this inspection as a minor generator during the period July 1, 1984 to June 30, 1985. The last inspection of this generator was April 19, 1984.

The inspection date of March 15 was established on March 14 by telephone. The company had received an NOV from the HW Program. The company wished to cooperate in resolving the violation. Company representatives are Robert Blythe, Quality Assurance Manager, and Keith Damon, Shipping Clerk.

Balteau Standard, Inc. manufactures utility and specialty electrical transformers. Hazardous wastes are produced during parts cleaning and parts painting. Other process residues and outdated chemicals are also stored on site. These residues and chemicals will be tested to determine if they are a hazardous waste. Transformers produced contain a dielectric mineral oil or a proprietary resin depending upon customer design specification.

No PCB oil is used. A bank of PCB filled capacitors is used to check transformer quality during production. The capacitor area is visually checked daily or before use for leakage. Total volume of PCB oil was estimated by Balteau to be 18.5 gallons.

MARCH 15, 1985 INSPECTION

At 1:15 p.m. March 15, 1985, Mr. Blythe and the author met at Balteau Standard, address above. Mr. Blythe was cordial and cooperated fully during the inspection.

USEPA RCRA



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The first order of business was to review the Department's NOV of March 8, 1985 (by Gary Calaba, HW Program). Two violations were cited:

1. Shipment of HW to an unlicensed facility (Priestly Oil and Chemical, Portland, OR) or a TSD facility was not listed.
2. Failure to use Manifest form 8700-22, Uniform Hazardous Waste Manifest, for HW shipments after September 1, 1984.

Item 1 deals with a shipment made 8/07/84 from Balteau Standard via Priestly Oil and Chemical as the transporter. This shipment shows a manifest number 080884-1 according to the copy accompanying Calaba's NOV letter. The letter refers to more than one manifest not listing a TSD facility. Only manifest 080884-1 was included in support of this statement. Mr. Blythe stated that Priestly purported their company as able (i.e. legally) to accept shipments of solvents for beneficial use. He had no knowledge that Balteau shipments were disposed of improperly upon receipt at the Priestly plantsite. Balteau Standard intends to contact other facilities that have the necessary permits and direct HW shipments to them. Mr. Blythe intends to confirm with Gary Calaba, DEQ, that the selected TSD facility is properly licensed, etc.. Mr. Blythe intends to provide the information requested in the NOV within the time allotted by Gary Calaba. No further enforcement action by the author on this violation is necessary at this time.

Item 2 requires the use of form 8700-22. Mr. Blythe stated that the necessary form will be used in the future. The rule OAR 340-102-020 regarding manifests was reviewed with Mr. Blythe. He also provided completed manifests 22388 and 22385. These are attached hereto. No further enforcement action by the author on this violation is necessary at this time.

Having completed a review of HW manifests for calendar year 1984, the inspection next focused on the current Notification of HW Activity form 8700-12. The last update was April 24, 1984. Mr. Blythe indicated all information remains current and complete.

Full generator status requires compliance with OAR 340-102-034. The following violations were noted:

<u>Outside Storage Area</u>	<u>102-034(1)(c) Accumulation date</u>	<u>102-034(1)(d) "Hazardous Waste"</u>
1 drum "Used Oil/TCE Mix"	Violation	Violation
1 drum Methylene chloride	Violation	Compliance
6 drums TCE waste	Violation	Violation
3 drums Xylene waste	Violation	Violation
6 drums Epoxy waste	Will analyze for HW status	
20 drums Unknown	Will analyze for HW status	

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<u>Satellite Storage- Paintbooth area</u>	<u>102-034(1)(c) Accumulation date</u>	<u>102-034(1)(d) "Hazardous Waste"</u>
1 drum TCE waste	Compliance	Compliance
1 drum Xylene waste	Compliance	Compliance
1 drum Epoxy waste	Will analyze for HW status	

Satellite Storage-
Instrument Transformer Area

1 drum TCE waste	Compliance	Compliance
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Balteau Standard is in violation of OAR 340-102-034(3) by failure to comply with Personnel Training (OAR 340-104-016); Preparedness and Prevention (OAR 340-104 Subdivision C); and Contingency Plan and Emergency Procedures (OAR 340-104 Subdivision D).

Violations of OAR 340-102-034 will be addressed in a regional Notice of Violation. Compliance will be required within 25 days of receipt of certified letter. Photographs in documentation of the outside storage area violations were taken with permission of Mr. Blythe. A diagram of the outside storage area is attached. The outside storage area was inspected for evidence of spills and container leakage. There were no visual indications of spills.

Balteau Standard has generated a solid waste as defined in OAR 340-101-002. A determination of this solid waste as a hazardous waste has not been made in violation of OAR 340-102-011. Observed were 7 55-gallon drums marked "Epoxy waste" and 20 55-gallon drums with no positive indications of the contents. If a hazardous waste, accumulation requirements of OAR 340-102-034 have not been met.

SUMMARY OF MARCH 15, 1985 INSPECTION

Numerous violations of generator accumulation, manifesting, and hazardous waste determination requirements of OAR 340 Division 102 were observed. Balteau Standard representatives pledged cooperation in quickly resolving the violations. The violations of the manifests are being addressed by Gary Calaba, DEQ, through an NOV dated March 8, 1985. Violations not cited by Calaba will be subject to regional enforcement action and followup.

Balteau Standard will also check 27 55-gallon drums of solid waste presently on site. Additional violations of OAR 340, Division 102, accumulation, marking and storage requirements, may be present if some or all of the "unknown" waste is a hazardous waste. Violations, if any, will be addressed after review of the waste analyses.

DB:fs

cc: HW Division

DEPARTMENT OF ENVIRONMENTAL QUALITY

Hazardous Waste Management
Inspection Checklist

PURPOSE -- This checklist is designed to serve as a guideline to the major points of the regulations adopted pursuant to Oregon Revised Statutes (ORS) 459.410 to 459.690 for inspectors to use while visiting hazardous waste (HW) regulated facilities. This checklist should not serve as a substitute for a detailed knowledge of the relevant regulations. The following is the outline of the checklist.

- I. General Information.
- II. Small Quantity Generator (SQG) Regulations (OAR 340-101-005)
- III. Generator Regulations (OAR 340 Division 102)
- IV. Treatment, Storage and Disposal (TSD) Permit Status Regulations (OAR 340 Division 104)

I. General Information

- A. Inspection Type of inspection: Evaluation (✓); Sampling (); Record Review (); Special (); Follow-up ()
Date/time inspection commenced: 1:15 PM 3-15-85

- B. Facility
EPA/State ID ORD-095-015-749
Name & Addresses Baileau Standard, INC
1. Mailing _____
2. Location 8001 Table Rock Road
Medford, OR 97503

Contact Robert Blythe, D.A. Manager
Telephone (503) 826-2113

- C. Inspector
Name (Print) Dennis Belsky Title Reg'l Programs Consultant
Region Southwest Phone 776-6010

D. Inspection Participants

<u>Name</u>	<u>Title</u>	<u>Phone</u>
<u>Robert Blythe</u>		
<u>Keith Damm</u>		

E. Compliance Summary

☒ No violations noted
Out of compliance

1. Areas of hazardous waste non-compliance requiring correction:

1. 340-102-034 (1) (c)

2. 340-102-034 (1) (d)

3. 340-102-034 (1) (e)

4. 340-102-011

2. Expected corrective action for areas of non-compliance items (including time schedule as appropriate):

Full compliance with 340-102-034 (1) (c) and -034 (1) (d)
by March 31, 1985

Full compliance with 340-102-034 (1) (e) and 340-
102-011 by April 15, 1985

3. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility? YES NO

A fenced enclosure is strongly recommended to
provide additional site security.

4. Other areas of non-compliance requiring followup via other DEQ programs:

None

Devin Belky
DEQ Inspector

March 20, 1985
Date

Generator Representative

Date

F. Notification/permit Information

1. Started operation: _____ Date: 1-69
2. Notification filed: YES NO Date: 4-24-84
3. Part A application filed: YES NO Date: _____
4. Part B called/date due: YES NO Date: _____
5. Part B application: YES NO Date: _____
6. Changes in Notification or Part A: _____

7. Facility is classified as:

Generator (✓)
Transporter ()
Treatment facility ()
Storage facility ()
Disposal facility ()
Small quantity generator ()
Recycler ()
Less than 90-day storage ()
Wastewater treatment unit exemption (WWTN) ()
Elementary neutralization unit exemption (ENU) ()

8. Does facility have a Part A withdrawal request in? YES NO N/A

Status: _____

Comments: _____

G. Hazardous Waste Generation (HW) and Management (List EPA Waste Code)

1. General information

a. Characteristic HW (DXXX)?

(1) Ignitability (D001) [340-101-021] YES NO
(2) Corrosivity (D002) [340-101-022] YES NO
(3) Reactivity (D003) [340-101-023] YES NO
(4) EP Toxicity [340-101-024] YES NO
List: _____/_____/_____/_____/_____

b. Listed HW?

TCE
Methylene chloride
xylene
(1) HW from non-specific sources (FXXX) [340-101-031]
F001 / F002 / F003 /
(2) HW from specific sources (KXXX) [340-101-032]
/ / / /

c. Discarded commercial chemical product (PXXX or UXXX)

(1) PXXX [340-101-033(6)] _____
(2) UXXX [340-101-033(7)] _____

d. Process manufacturing residue YES NO N/A
(≥3% of a P listed waste; ≥10% of a
U listed waste) [340-101-033(3)(a)]

e. Pesticide or pesticide manufacturing residue [340-101-034] YES NO N/A

f. Pesticide residue or empty containers produced by the use of pesticides [340-109-020] YES NO N/A

g. Has facility petitioned to delist waste? [340-101-022] YES NO
Date: _____ Comments: _____

h. Does facility qualify for WWTU or ENU? [340-101-003(2)(d)] YES NO N/A
Comments: _____

i. Has a determination been made for each waste generated that it is or is not a RCRA hazardous waste? [340-102-011] YES NO

(1) What are the wastes generated? Mr. Blythe is making arrangements to test 27 55 gallon drums of process residues and/or unused commercial chemical products as part of a "spring cleaning" at the plant.

(2) How was the hazardous waste determination made for each waste (i.e., lab analyses, knowledge of waste streams or processes, waste listed in OAR 340 Division 101)?

Comments: Samplers will be taken from each drum in (1) above. Results will be transmitted to DEQ. Any of the drums of process residue that are a HW will may require a subsequent notification of Form 8700-12 and a storage site closure process to revert back to generator status. These possibilities were discussed with Mr. Blythe.
Solvent residues are determined to be a HW by knowledge of the waste stream itself.

(3) Are records available on the determination(s)? [340-102-040(3)] YES NO

(4) Are all hazardous wastes noted during inspection listed on the facility's RCRA notification/Part A application? YES NO

If not, explain:

2. Specific information: Provide the following information for each of the individual HW streams listed above. (Complete a separate form for each HW and attach.)

- EPA HW Code
- HW description
- Composition (including sampling requirements)
- Process producing waste
- Rate of waste production
- Time of storage
- Waste handling prior to disposal
- Waste disposal practice and manifest
- Reporting and recordkeeping
- Comments

H. Miscellaneous Notes:

	<u>Xylene</u>	<u>1,1,1, TCE</u>	<u>Methylene chloride</u>
a	F003	F001	F002
b	xylene	1,1,1, TCE	Methylene chloride
c	Solvent/solids	waste solvent	solvent/paint solids
d	Paint	degreasing	cleaning molds/Resin cleanup
e	5500 #/ATR	6000 # /ATR	1100 #/ATR
f	55gallon drums	55gallon drums	55gallon drums
g	recycle @ TSD	recycle @ TSD	recycle @ TSD
h	55-gallon drums	55-gallon drums	55-gallon drums
i	adequate	adequate	adequate
j	(Manifest and disposal violations are being addressed by Gary Calabrese I-5 HW Program)		

III. Generator Regulations OAR 340 Division 102

- A. Is the facility or does facility claim to be a small quantity generator (under 340-101-005)? YES ☐ NO ☒

Comments: _____

- B. Does generator transport its own waste? YES ☐ NO ☒

If NO, what is transporter's EPA ID, name, address and phone

EPA ID See attached manifests

Name _____

Address _____

Telephone _____

- C. Does generator use the manifest system? YES ☒ NO ☐
[340-102-020]

Does generator substitute shipping papers for the manifest for wastes shipped off-site for beneficial use or reuse? YES ☐ NO ☒
[340-102-020(5)]

1. Does the generator ever offer his hazardous waste to transporters or to TSD facilities which do not have an EPA ID number? YES ☒ NO ☐
[340-102-020(2)]

What transporters or TSD facilities?

*Priestly Oil & Chemical Company Portland, OR
See manifest 080884-1 violation following by Gary Catana, DEA*

2. A generator transporting or offering for transport hazardous waste for off-site TSD must first prepare a manifest.
[340-102-020(1)]
3. If the waste is undeliverable to the primary or alternate facility, the generator must either designate another alternate facility or instruct the transporter to return the waste.
[340-102-020(4)]

Does the manifest contain the following information: [340-102-021(1)]

Manifests checked are

080884-1

22385

22388

- a. Manifest document number [340-102-021(1)(a)] ☒ YES NO
- b. Generator's name, mailing address, phone number and EPA ID number [340-102-021(1)(b)] ☒ YES NO
- c. Name and ID number of each transporter [340-102-021(1)(c)] ☒ YES NO
- d. Name, address and EPA ID number of the designated and alternate TSD facilities, if any [340-102-021(1)(d)] ☒ YES ☒ NO # 080884-1
- e. Description of waste(s) required by DOT regulations in 49 CFR 172.101, 172.202, 172.203 [340-102-021(1)(e)] YES NO
- Proper shipping name ☒ YES NO
- Hazard class ☒ YES NO
- Identification number ☒ YES NO
- f. Total quantity of each hazardous waste by units of weight or volume and type and number of containers placed aboard transport vehicle [340-102-021(1)(f)] ☒ YES NO
4. Does the manifest contain the certification attesting to proper classification, description, packaging, labeling, marking and condition in accordance with DOT and DEQ regulations? [340-102-021(2)] ☒ YES NO
5. Does the manifest contain an adequate number of copies to provide one copy for: [340-102-022]
- a. Generator's records ☒ YES NO
- b. Records of each transporter ☒ YES NO
- c. TSD facility owner or operator's records ☒ YES NO
- d. Signature by each transporter and return to generator ☒ YES NO
- e. Signature by TSD facility and return to generator ☒ YES NO
6. Does the generator use the manifest properly by: [340-102-023(1)]
- a. Signing the certification [340-102-023(1)(a)] ☒ YES NO

- b. Obtaining signature and date of acceptance from initial transporter ☒ YES ☐ NO
[340-102-023(1)(b)]
- c. Retaining one copy of the transporter's signed manifest for 3 years or until receipt of a signed copy from disposal facility [340-102-023(1)(c)] ☒ YES ☐ NO
- d. Giving transporter the remaining copies of the manifest [340-102-023(2)] ☒ YES ☐ NO
7. Does the generator contact the transporter and/or the designated TSD facility to determine the shipment status in the event that a signed copy from the designated facility has not been received within 35 days? [340-102-042(1)] ☒ YES ☒ NO 080884-1
8. Does the generator submit an Exception Report to the DEQ in the event that a signed copy of the manifest has not been received from the designated TSD facility within 45 days? [340-102-042(2)] YES ☒ NO 080884-1
9. If a Manifest Exception Report was submitted, did it include the following: [340-102-042(2)]
- a. A legible copy of the manifest, and [340-102-042(2)(a)] YES ☐ NO
- b. A letter of explanation describing efforts and results of status investigation [340-102-042(2)(a)] YES ☐ NO
- D. Does generator operate a specific area on-site for container handling or storage? ☒ YES ☐ NO
1. Does generator comply with the requirements set forth in governing on-site waste accumulation? [340-102-034(1)(a)] YES ☐ NO
- a. Labeled and marked with words "Hazardous Waste" [340-102-034(1)(d)] ☒ YES ☒ NO See cover memo for details
- b. Date period of accumulation begins [340-102-034(1)(c)] ☒ YES ☒ NO See cover memo for details
- c. Inspections (weekly for containers) [340-104-174] ☒ YES ☐ NO
2. Are incompatible wastes segregated? YES ☐ NO N/A [340-104-177(3)]
3. What quantities of HW are stored? 1 shipment per quarter.
average shipment 12,000 #
multiple manifests may be used

4. What is the longest period that it has been stored? Solvents less than 90 days. 26 drums waste process residue.
5. Were there any hazardous wastes stored on-site at the time of inspection? (90-day storage allowance is allowed only if the waste is stored in accordance with OAR 340-102-034; i.e., must be stored in containers or tanks. Thus, need to make note if storing in waste pile, etc.)
- and outdated commercial chemical products may be HW if so, storage is 790 days. This will be followed up after lab results in.*
- a. If YES, do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? [340-102-034(a) or (b)] YES NO
- b. If not properly packaged or in secure tanks, please explain.
- _____
- _____
- _____
- c. Are containers clearly marked and labeled? [340-102-034(1)(d)] YES NO *See cover memo*
- d. Do any containers appear to be leaking? YES NO
- e. If YES, how many? _____
6. Generators may store hazardous waste for less than 90 days without a permit or TSD status providing certain requirements have been met. [340-102-034(1)]
- a. Are the containers made of or lined with materials which will not react with and are compatible with the hazardous waste to be stored in them? [340-104-172] YES NO
- b. Are the containers always closed, except to add or remove waste? [340-104-173(1)] YES NO
- c. Are container storage areas inspected weekly for leaks and container deterioration? [340-104-174] YES NO

- d. Are precautions taken to prevent accidental ignition or reaction of ignitable or reactive waste? YES NO
[340-104-017(1)]
- e. Are containers holding ignitable or reactive waste located at least 50 feet from the facility's property line? YES NO
[340-104-176]
- f. Is the facility aware of and complying with the following requirements for incompatible wastes:
- (1) Incompatible wastes must not be placed in the same container, unless in compliance with OAR 340-104-017(2). [340-104-177(1)] YES NO *N/A*
- (2) HW must not be placed in an unwashed container that previously held an incompatible waste. [340-104-177(2)] YES NO *N/A*
- (3) Are storage containers holding HW that are incompatible with any waste or other material stored nearby separated from or protected from them by means of a dike, berm, wall or other device? [340-104-177(3)] YES NO *N/A*
Explain:

- g. Before transport, are containers marked or labeled in a manner equivalent to 49 CFR 172? YES NO
[340-102-031 and 340-102-032]
- h. Is secondary containment provided for storage of more than 100 drums (required after January 1, 1985)? YES NO
[340-102-034(1)(f)]
- i. Comments: *Serious consideration is being given to fenced enclosure. Hazardous waste storage area photographs will be submitted when available.*

7. a. Does the generator import or export HW? YES NO
[340-102-050]
- b. If YES, has notification of this activity been submitted to the Department and the EPA Regional Administrator? [340-102-050(2)(a)] YES NO *N/A*
- c. Is a copy of that notification available? (If YES, obtain copy.) YES NO *N/A*
- d. If a copy is not available, or cannot be obtained, determine: (1) when the notification was submitted; (2) for what waste type; and (3) for what foreign facility (name and address). YES NO *N/A*
8. Preparedness and Prevention (OAR 340-104 Subdivision C)
[340-102-034(1)(c)] *No plan*
- a. Is facility maintained and operated to minimize the hazards of fire, explosion, and sudden or non-sudden releases to the environment? [340-104-031] YES NO
- b. Is internal emergency communication equipment or alarm systems installed? What type? [340-104-032(1)] YES NO
- c. Is a device (e.g., telephone) immediately available for summoning emergency assistance? [340-104-032(2)] YES NO
- d. Are fire extinguishers or other emergency equipment immediately available on-site? [340-104-032(3)] YES NO
- e. Is emergency communications and response equipment tested? How often? [340-104-033] YES NO
- f. Is aisle space adequate for emergency response? What is aisle spacing? [340-104-035] YES NO
- g. (1) Have any arrangements been made with local emergency response organizations? [340-104-037(1)] YES NO
- (2) Which organizations?

(3) If local organizations have declined to enter into response agreements, is this documented in the facility's operating record? [340-104-037(2)]	YES	NO
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9. Contingency Plan/Emergency Procedures (OAR 340-104 Subdivision D) [340-102-034(1)(e)]

No plan

a. Has contingency plan been developed? (It may be a modified SPCC plan.) [340-104-051(1)]	YES	NO
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b. Have incidents occurred where the plan has been implemented?	YES	NO
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c. Have incidents occurred where the plan should have been implemented but was not? [340-104-051(2)] Explain:	YES	NO
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d. A copy of the plan should either be obtained for post-inspection office review or it should be examined during inspection for the following:

(1) Does the plan describe actions to be taken by personnel in response to fire, explosion or releases to the environment? [340-104-052(1)]	YES	NO
---	-----	----

(2) Does the plan describe arrangements made with external emergency response organizations? [340-104-052(3)]	YES	NO
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(3) Does the plan list those qualified to act as emergency coordinator including their name, address and phone? [340-104-052(4)]	YES	NO
Is the plan current?	YES	NO

(4) Is all emergency equipment available at the facility listed in the plan? [340-104-052(4) and 340-104-054]	YES	NO
--	-----	----

(a) Is the location and a description of the equipment included? [340-104-052(5)]	YES	NO
--	-----	----

(b) Are capabilities described for each piece or equipment unit? YES NO
[340-104-052(5)]

(5) Does the plan include evacuation procedures including a description of signals to initiate evacuation (and routes and alternate routes)? YES NO
[340-104-052(6)]

(6) Is a copy of the plan maintained at the active facility (vs. main office)? YES NO
[340-104-053(1)]

(a) Has a copy been supplied to appropriate off-site emergency response organizations? Which? YES NO
[340-104-053(2)]

(7) Is at least one designated person always available to respond to emergencies (i.e., of those on the coordinator list)? YES NO
[340-104-055]

How are they available? [340-104-055]

Are there limits of this person's authority to respond to emergencies (i.e., resource commitments)? YES NO
[340-104-055]

(8) Has an emergency occurred? YES NO

Was the plan implemented? YES NO

(If YES, describe incident and attach if not already reported).

10. Personnel Training (OAR 304-104-016)

[340-102-034(1)(e)] *No personnel training*

a. Has a training program been developed? YES NO
What type? (Classroom? On-the-job?)
[340-104-016(1)(a)]

b. Does the program include contingency plan and response training? YES NO
[340-104-016(1)(b)]

c. Does the program include measures to familiarize personnel with emergency response equipment, procedures and systems, including: [340-104-016(1)(c)]

- | | | |
|---|-----|----|
| (1) Procedures for using and maintaining equipment?
[340-104-016(1)(c)(A)] | YES | NO |
| (2) Key parameters for automatic waste feed cut-off? [340-104-016(1)(c)(B)] | YES | NO |
| (3) Communications or alarm equipment? [340-104-016(1)(c)(C)] | YES | NO |
| (4) Response to fire and explosion? [340-104-016(1)(c)(D)] | YES | NO |
| (5) Response to groundwater contamination incidents? [340-104-016(1)(c)(E)] | YES | NO |
| (6) Facility shut-down? [340-104-016(1)(c)(F)] | YES | NO |
| d. Are records available at the facility for the following: [340-104-016(4)] | | |
| (1) Job title for each position related to hazardous waste management and maintaining equipment?
[340-104-016(4)(a)] | YES | NO |
| (2) Written job description for each job title? [340-104-016(4)(b)] | YES | NO |
| (a) Does the job description include the skill, education or qualifications required for the position?
[340-104-016(4)(b)] | YES | NO |
| (b) The duties assigned to that position? [340-104-016(4)(b)] | YES | NO |
| (3) A written description of the type and amount of training to be given to those in each job position?
[340-104-016(4)(c)] | YES | NO |
| (4) A record of training completed or experience obtained for each job position by employee?
[340-104-016(4)(d)] | YES | NO |
| (5) Was the required training obtained within 6 months of employment by each individual involved in hazardous waste management activities? [340-104-016(2)] | YES | NO |

- E. Is generator familiar with Generator Reporting Procedures? *rules covered in detail during inspection*
1. Quarterly reports [340-102-041] ☒ YES NO
 - a. For wastes shipped in-state ☒ YES NO
 - b. For wastes shipped out-of-state ☒ YES NO
 - c. For wastes shipped for beneficial use or recycling ☒ YES NO
 2. Exception reports [340-102-042] ☒ YES NO
 3. Spills and discharges to the environment [340-108-020] ☒ YES NO
 4. Comments: *Mr Blythe has copy of current rules. Violations will be taken care of per D&A direction*
- F. Is generator aware of and complying with regulations concerning the preparation of hazardous waste for transport? ☒ YES NO

1. Packaging 49 CFR 173, 178, 179 and with requirements of state [340-102-030] ☒ YES NO
2. Labeling 49 CFR 172 [340-102-031] ☒ YES NO
3. Marking 49 CFR 172 [340-102-032] ☒ YES NO
4. Placarding 49 CFR 172 Subpart F [340-102-033] ☒ YES NO
5. Containers of hazardous waste must be marked with the following, or essentially equivalent, words and information displayed in accordance with 49 CFR 172.304 [340-102-032(1)]:

HAZARDOUS WASTE -- Federal law prohibits improper disposal. If found, contact the nearest police or public safety authority, and the U.S. Environmental Protection Agency.

Generator's name and address _____

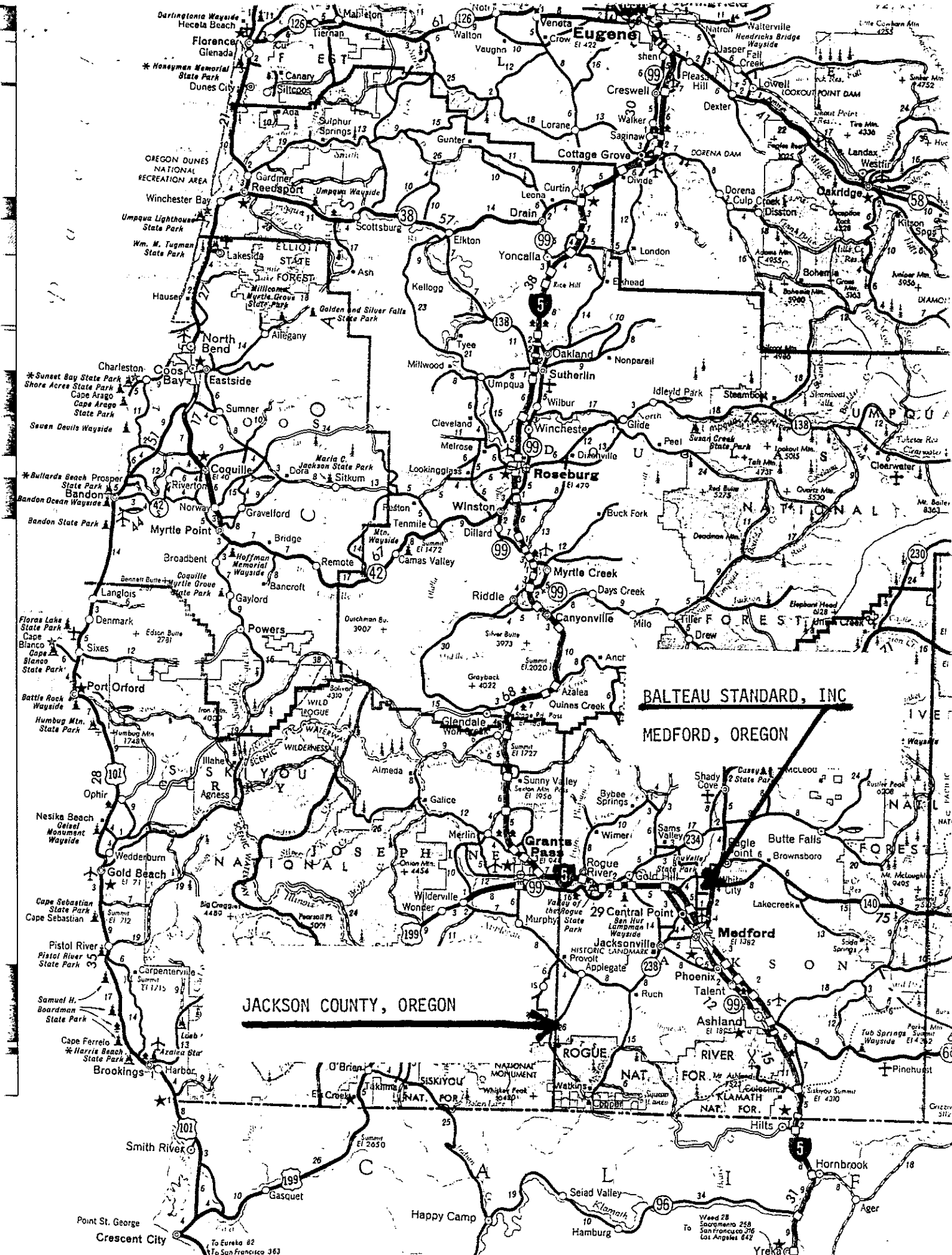
Manifest document no. _____

[340-102-032(2)]

6. Comments: *Batteau Standard using commercially available labels. Labels will be put on drums during accumulation to be in compliance*
- G. Are any wastes generated at this facility being transported or stored prior to being recycled, reclaimed or recovered? YES ☒ NO *(with 102-034(1)(c) and 102-034(1)(d))*

If YES, what are they _____

1. Sludge ()
2. Characteristic HW ()
3. Listed HW ()
4. Comments: *Shipment to Priestly (Manifest 080884-1) was to allow Priestly to reclaim solvent. Since waste is F001 (1,1 Tce), this HW must go to TSD facility. Priestly is not a permitted TSD facility. No more shipments to Priestly will be made. Gary Delain, D&A is pursuing violation of 102-012(3).*



See Map 10

See Map

18

BALTEAU STANDARD, INC
*8001 Table Rock Road
Medford, OR 97503



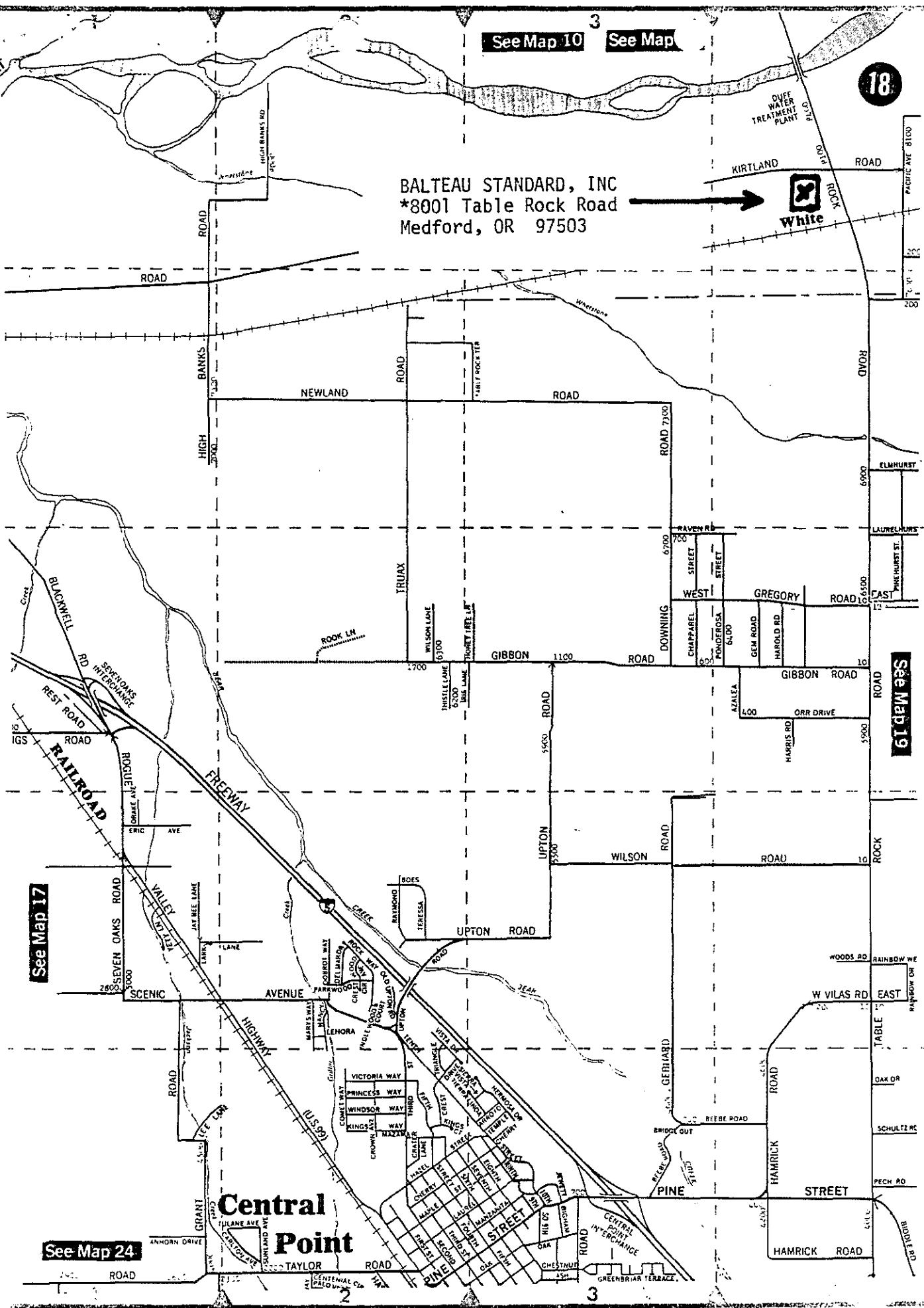
White

See Map 19

See Map 17

See Map 24

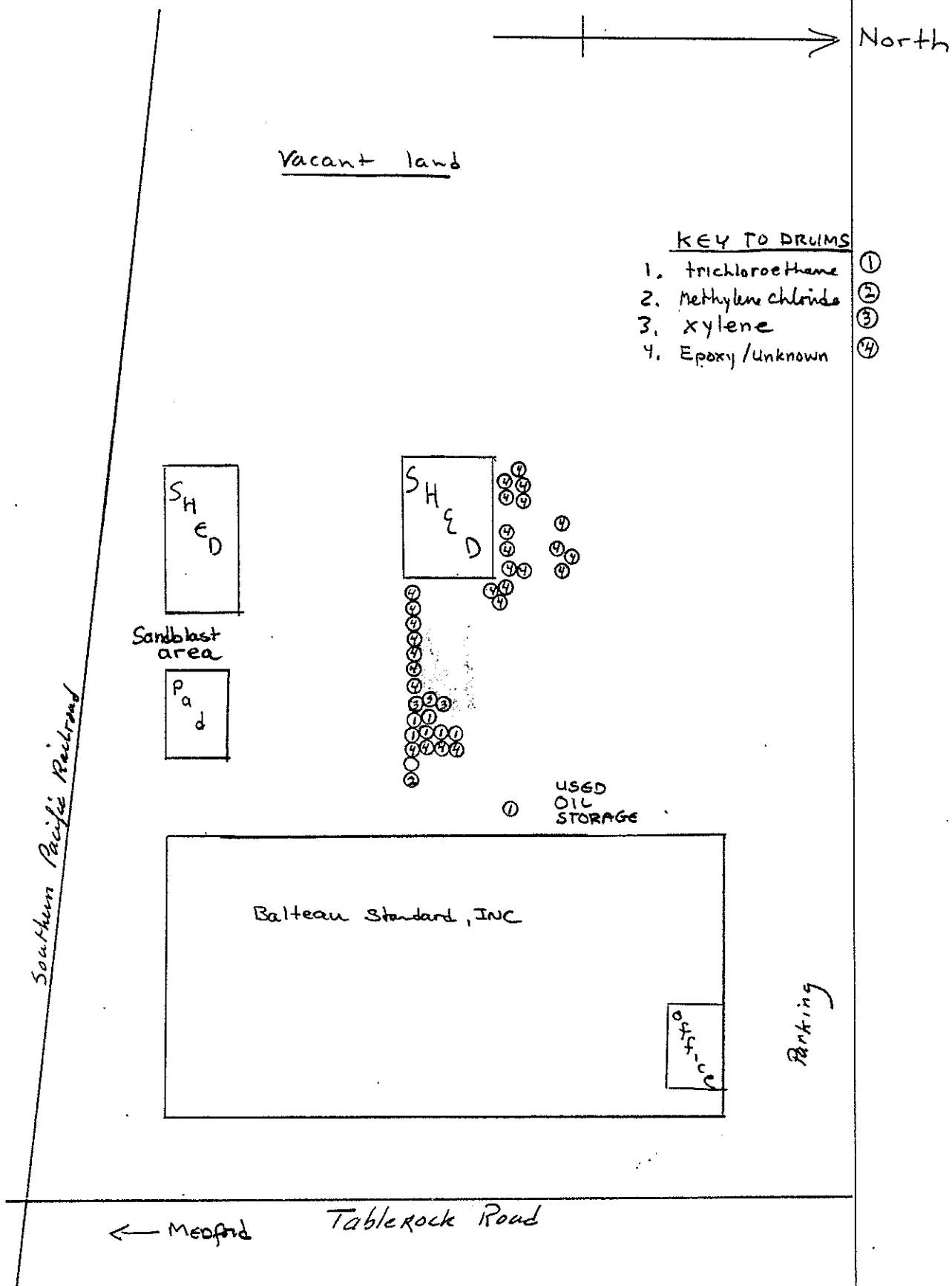
Central
Point



Balteau Standard Inc
Medford, OR

Hazardous Waste
Storage Area

ORD 095-015-749
1 ch 15, 1985



- No Scale -



DESIGNATED FACILITY
CHEM-SECURITY SYSTEMS, INC.
STAR ROUTE, ARLINGTON, OR. 97812

ID. NO. _____
ARLINGTON (503) 454-2777
BELLEVUE (206) 827-0711

PORTLAND (503) 223-1912
VANCOUVER, B.C. (604) 688-7612

JAN 18 1985

CHEMICAL TRANSPORTATION MANIFEST

22385

1 GENERATOR BalTezy STD. INC. ID. NO. ORD095015749
ADDRESS 8001 Table Rock Rd. Medford OR 97503 PHONE (503) 826-2111

WASTE DESCRIPTION	CONTAINER		GAL.	LB.	FT.
	QUANTITY	TYPE			
WASTE Trichloroethane 1-1-1 OR4-A UN 2831	12	55 GAL DRUM	660	6000	
WASTE Methylene Chloride OR4-A UN 1503	2	55 GAL DRUM	110	1000	
Some BBIs Not Full					

DOT SHIPPING NAME _____ DOT HAZARD CLASS _____

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT EITHER OF THE CHEM-SECURITY SYSTEMS OFFICES
AND/OR CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST
GUARD (800) 424-8802, OR CONTACT, IN CANADA, TRANSPORT CANADA (613) 996-6666
FOR EMERGENCY ASSISTANCE.

Title to all materials furnished for disposal herein shall be deemed to be vested in Chem-Security Systems, Inc., immediately upon acceptance of such materials by Chem-Security Systems, Inc., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by Chem-Security Systems, Inc. Disposal operations by Chem-Security Systems, Inc., will be in accordance with procedures approved by the Oregon Department of Environmental Quality and the United States Environmental Protection Agency.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE [Signature] DATE 12-31-84

2 TRANSPORTER Assurance TRANSPORTATION INC. ID. NO. ORD0934763
ADDRESS 3813 CRATER LAKE HWY Medford OR 97501 PHONE (503) 773-5831

TRANSPORTER SIGNATURE Stanley Bates DATE 12-31-84

3 TREATMENT FACILITY OR COLLECTION SITE BIRON-BLAKESLEE INC. ID. NO. ORD06148338
ADDRESS 5920 N.E. 89th AVE PORT ORLANDER FL 32050 PHONE (503) 252-3468

SIGNATURE [Signature] DATE 1/4/84

4 ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____

ADDRESS _____



DESIGNATED FACILITY
CHEM-SECURITY SYSTEMS, INC.
STAR ROUTE, ARLINGTON, OR. 97812

ID. NO. _____
ARLINGTON (503) 454-2777
BELLEVUE (206) 827-0711

PORTLAND (503) 223-1912
VANCOUVER, B.C. (604) 688-7612

CHEMICAL TRANSPORTATION MANIFEST

JAN 07 1985

22388

1 GENERATOR BALTECH STD. INC ID. NO. ORD095015749
ADDRESS 8001 Tangle Rock Rd. Medford OR 97503 PHONE (503) 826-2113

WASTE DESCRIPTION	CONTAINER		GAL.	LB.	FT.
	QUANTITY	TYPE			
<u>WASTE Xylene</u> <u>UN 1307</u> <u>#504</u>	<u>11</u>	<u>55 GAL</u> <u>DRUM</u>	<u>605</u>	<u>5500</u>	
<u>SOME BBLS NOT FULL</u>					

DOT SHIPPING NAME Xylene DOT HAZARD CLASS Flammable Liquid

PHYSICAL STATE (circle) SOLID LIQUID SLUDGE OTHER _____

MAJOR HAZARD (circle) TOXIC CORROSIVE IGNITABLE REACTIVE OTHER _____

SPECIAL INSTRUCTIONS (HANDLING/EMERGENCY) _____

IN THE EVENT OF A SPILL, CONTACT EITHER OF THE CHEM-SECURITY SYSTEMS OFFICES
AND/OR CONTACT, IN THE UNITED STATES, THE NATIONAL RESPONSE CENTER, U.S. COAST
GUARD (800) 424-8802, OR CONTACT, IN CANADA, TRANSPORT CANADA (613) 996-6666
FOR EMERGENCY ASSISTANCE.

Title to all materials furnished for disposal herein shall be deemed to be vested in Chem-Security Systems, Inc., immediately upon acceptance of such materials by Chem-Security Systems, Inc., from the generator or transporter. The generator shall have no right to recovery nor any credit for the potential value of any substances contained in such materials furnished for disposal, except as separately agreed in writing by Chem-Security Systems, Inc. Disposal operations by Chem-Security Systems, Inc., will be in accordance with procedures approved by the Oregon Department of Environmental Quality and the United States Environmental Protection Agency.

This is to certify that the above-named materials are properly classified, described, packaged, marked, labeled and are in proper condition for transportation according to the applicable regulations of the U.S. Department of Transportation and the U.S. Environmental Protection Agency. Signed and dated by the authorized agent of the generator:

GENERATOR SIGNATURE [Signature] DATE 12-31-84

2 TRANSPORTER ASSURANCE TRANSPORTATION INC ID. NO. ORD093476307

ADDRESS 3813 CRATER LAKE HWY. MEDFORD OR 97504 PHONE (503) 723-5837

TRANSPORTER SIGNATURE Stanley Bates DATE 12-31-84

3 TREATMENT FACILITY OR COLLECTION SITE W/C/CLAY COLOMBIA CORP ID. NO. WAD092300250

ADDRESS 625 532ND WASHINGTON ST WASH DC 20001 PHONE (202) 835-5159

SIGNATURE [Signature] DATE 1-4-85

4 ALTERNATE TRANSPORTER NO. 1 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE TRANSPORTER NO. 2 _____ ID. NO. _____

ADDRESS _____ PHONE _____

TRANSPORTER SIGNATURE _____ DATE _____

ALTERNATE FACILITY _____ ID. NO. _____

ADDRESS _____